

REMARKS

Claim 100 has been amended to enhance the readability of the claim. No new matter has been added to the claim, and no additional search should be required as a result of this amendment. No claims have been cancelled or added. Therefore, claims 100-115 are pending in the application.

I. SUMMARY OF EXAMINER INTERVIEW

On December 19, 2008, Applicant's representatives, Deborah Caswell and Marcel Bingham, met via teleconference with Examiner Leon Harper to discuss Claim 100 and the cited *Thomson* reference. Applicant wanted to better understand which elements described in the *Thomson* reference the examiner considers to be equivalent to the elements of Claim 100. Examiner Harper clarified that the claimed ETL application is held to correspond to *Thomson's* UDS (including components such as the Drill Through Extractor and Query Modifier). He further confirmed that the claimed Source and Target databases are held to correspond to *Thomson's* description in paragraph 59 that a Client system may include a database system. It was further confirmed that the Source and Target Database systems holding the data to be queried and displayed in *Thomson's* model are **not** held to correspond to the claimed Source and Target databases as might be expected. In addition, we confirmed that *Thomson's* report is held to correspond to the claimed database object that is transported from one database to another (*i.e.* the report is transported from source client database system to target client database system).

The Examiner is thanked for granting this very productive interview and for providing this valuable clarification.

II. ISSUES RELATED TO THE PRIOR ART – SECTION 102 -- *THOMSON*

Claims 100-115 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by *Thomson* (US 20040034615). The rejection is respectfully traversed.

Claim 100

Claim 100 recites in part:

*“a source ETL application receiving, from a user, input that selects one or more **database objects** to be transported from a source database to a target database”*

Thomson does not teach or suggest the quoted feature.

The Office Action relies on the passage at paragraph [0021] to allegedly teach this feature. Paragraph [0021] states in its entirety:

“Embodiments the invention provides a method for presenting data comprising using a processor to receive signals from a user input device indicating that the user selected the first data in the first context; translating the first context into a second context; using the second context to identify a second data item associated with the first data item; and presenting the second data to the user.”

There is no mention of a database in the cited passage, much less database objects. Even if the first and second data were understood to be database objects, there is no mention of transporting the first or second data to a target database. It only states that the second data is presented to the user.

Continuing, Claim 100 recites:

*“wherein said source database system includes source database **metadata that describes database objects of said source database**”*

The Office Action relies on paragraph [0057] to allegedly teach this quoted feature. The relevant passage states:

*“The extracted context is passed along with the target report. **Metadata about the report** includes, for example, a unique name or identifier, location of the originating client, originating and target data sources, and associated rules.”*

The Office Action considers the report in the above passage to be equivalent to the claimed database objects, and information about the report is held to correspond to the metadata that describes database objects. This correspondence was confirmed during the Examiner Interview. However, there is no teaching or suggestion in *Thomson* that a report is a database object or that it is stored in a database. To the contrary, *Thomson* defines a report in paragraph [0045] to be:

*“Report” refers to any document or other high level **representation of data** obtained from a database as a result of a query. A report is **the combination of query specification and layout/presentation specification** and may include a static snapshot of results from an earlier execution of a report.*

Even if the client system happens to be a database system as described in paragraph [0059] of *Thomson*, there is still no teaching or suggestion that the query specification or the presentation specification is stored in or retrieved from the database running on the system, much less that the combination of them comprising a report is stored in the database. A report is a representation of the data, not the data itself. In fact, *Thomson’s* paragraph [0106] states that Figure 9, which is a user presentation, is an example of a report. There’s no teaching of storing or retrieving the user presentation to/from a database. Even if it is inherent that the user presentation is stored in memory of the client system for display to the user, volatile memory is not the same as a database, and a presentation is not the same as a database object.

Claim 100 further recites:

*“wherein said source ETL application includes **source ETL metadata, separate from said source database metadata**, that describes database objects of said source database”*

The Office Action relies on the passage at paragraph [0063] of *Thomson* to allegedly teach the quoted feature:

*“Once the user selects a target report, extraction rules are applied to extract the context. Extracted context is passed along with the target report and **metadata about the report**. The metadata about the report includes, by way of example, the unique name, location, originating and target data sources and associated rules. This package is then passed back to the UDS Translation Service module 106. The preferred route is as an XML stream.”*

The cited passage only describes metadata for a report, the report being held to correspond to a database object. Thus, it follows that metadata about the report corresponds to the source database metadata. Although it has already been established above that a report is not a database object, even if a report were a database object, then the cited passage would describe source database metadata. However, the passage does not describe any other kind of meta-data. The UDS components are collectively considered to be equivalent to the ETL application (as discussed during the interview). However, the cited passage does not teach or describe any meta-data for the UDS components that are separate from the report. Paragraph [0095] of *Thomson* also describes metadata, but does not describe ETL meta-data separate from source database metadata. Paragraph [0095] states in part:

*“UDS designer 502 retrieves **metadata** to populate the translation maps 504 and includes the capability to use selected application program interfaces (APIs) to access cube and relational metadata and to **provide the originating and target data source metadata**.”*

The metadata described in paragraph [0095] is metadata describing the database objects in the source and target database of the **server** database systems that contains the data that will be queried for and displayed to the user on the client system. It does not describe metadata for the UDS components (ETL application) that are separate from the source database (client database system) metadata.

Claim 100 additionally recites,

*“said target ETL application to perform loading said database objects within said target database; wherein said loading includes: ... incorporating within said target database **a tablespace holding data for at least one of said one or more database objects.**”*

The Office Action relies on paragraph [0036], [0050], and [0054] to allegedly teach this feature. Paragraph [0036] describes the “Business Objects Universe” (BOU) that presents to the user a view of the database that is more business-oriented than the database structure itself. Although the cited passage describes abstracting databases that have tables, it does not describe storing a database map in a table. In fact, it states that the BOU is “*part repository.*” A repository is not necessarily a database, and objects stored in a repository are not necessarily loaded into tables. Paragraph [0050] states that the Universe comprises a set of objects that are “about” databases. There is no teaching or suggestion that the Universe objects themselves are stored in a database. Paragraph [0054] describes the run time architecture of *Thomson’s* system, stressing that normally server-side databases perform the majority of data processing. There is no mention or description of client-side database loading objects into tables, much less the UDS components performing the loading. Therefore, none of the cited passages describe or in any way mention an ETL application (UDS components) loading data for a database object (report) into a tablespace of a target database system (client database system).

Anticipation requires that a single prior art reference disclose every limitation in a patent claim for the prior art to anticipate the claim. For at least the reasons above, *Thomson* fails to disclose all the features of Claim 100. Therefore, Claim 100 is patentable under 35 U.S.C. 102(e) over *Thomson*. Reconsideration and withdrawal of the rejection is respectfully requested.

Claim 108**Claim 108 recites,**

A computer implemented method comprising:

*a source **external application** receiving, from a user, input that selects one or more database objects, wherein said one or more database objects include an **internal database object** to be transported from a source database to a target database and an **external database object** to be transported to a **target external application**;*

wherein said source database system includes source database metadata that describes said internal database object of said source database;

wherein said source external application includes source external application metadata, separate from said source database metadata, that describes said one or more database objects;

said source external application causing generation of a module comprising metadata that describes said one or more database objects;

a target external application reading said module;

wherein said target database system includes target database metadata that describes said internal database object;

wherein said target external application includes target external metadata, separate from said target database metadata, that describes said one or more database objects; and

wherein said reading said module causes said target external application to perform loading said one or more database objects within said target database and said target external application, wherein loading includes:

modifying said target external metadata to describe said one or more database objects; and

modifying said target database metadata to describe said internal database object.

Claim 108 has many of the same features as Claim 100. An “*ETL application*” has been replaced with “*an external application*”, “*ETL metadata*” has been replaced with “*an external database object*,” and “*database objects of said source database*” has been replaced with “*internal database object*.” Thus for Claim 108, the “*UDS components*” are collectively considered to be equivalent to the “*external application*” and the “*internal database object*” are considered to be equivalent to the *report*. The same arguments apply as for Claim 108 as for Claim 100. There is no teaching or suggestion

of an external database object apart from the internal database object that is transported to a target external application. For this and all other reasons given for Claim 100, Claim 108 is patentable under 35 U.S.C. 102(e) over *Thomson*. Reconsideration and withdrawal of the rejection is respectfully requested.

III. DEPENDENT CLAIMS

The pending claims not discussed so far are dependent claims that depend on an independent claim discussed above. Because each of the dependent claims includes the limitations of claims upon which it depends, each of the dependent claims is patentable for at least those reasons the claims upon which each dependent claim depends is patentable. Removal of the rejections with respect to the dependent claims and allowance of the dependent claims is respectfully requested. In addition, the dependent claims introduce additional limitations that independently render them patentable. Due to the fundamental difference already identified, a separate discussion of those limitations is not included at this time.

IV. CONCLUSION

For the reasons set forth above, Applicant respectfully submits that all pending claims are patentable over the art of record, including the art cited but not applied.

Accordingly, allowance of all claims is hereby respectfully solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Respectfully submitted,

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